

### REMARKS

This Application has been carefully reviewed in light of the Office Action mailed May 21, 2004. At the time of the Office Action, Claims 1-18 were pending in this Application. Claims 1-18 were rejected. Applicants respectfully request reconsideration and favorable action in this case.

#### **Rejections under 35 U.S.C. §102**

Claims 1-18 were rejected by the Examiner under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 6,362,421 issued to Russell K. Layton, Jr. ("Layton"). Applicants respectfully traverse and submit that Claims 1-18 are patentable over Layton.

Layton discloses a junction box that "allows a user to connect multiple electronic devices to a primary electronic device." (Abstract)

Applicants Claim 1 calls for various features including, among others, a "contact wire is brought out of the housing through a housing wall surface enclosing the contact wire and that the contact wire passes through an elastomeric seal which seals the wall surface against oil and splash water."

Applicants Claim 9 calls for various elements including, among others, a "contact wire is enclosed by a glass seal disposed in a compression element which can be inserted in the wall surface of the housing."

Applicants Claim 10 call for various elements including, among others, a "connecting leads comprise conductors reinforced by extruded ribbons and are connected to the contact pins."

Applicants Claim 11 call for various elements including, among others, "at least one opening in said base plate," "providing a sealing element which includes a connector for providing electrical connection," and "sealing said opening with a seal element."

Layton cannot anticipate Applicant's Claim 1, 9, 10 or 11, because Layton does not teach, suggest or disclose all of the elements recited by Claims 1, 9, 10 or 11. For example, Layton fails to teach, disclose or suggest that a "contact wire is brought out of the housing through *a housing wall surface enclosing the contact wire* and that the *contact wire passes through an elastomeric seal* which seals the wall surface against oil and splash water," as recited by Claim 1. (emphasis added) Additionally, Layton fails to teach, disclose or suggest

that a "contact wire is enclosed by a *glass seal disposed in a compression element* which can be inserted in the wall surface of the housing," as recited by Claim 9. (emphasis added)

Additionally, Layton fails to teach, disclose or suggest that "connecting leads comprise conductors *reinforced by extruded ribbons and are connected to the contact pins*," as recited by Claim 10. (emphasis added) Further, Layton fails to teach, disclose or suggest " *at least one opening in said base plate*," " *providing a sealing element which includes a connector for providing electrical connection*," and " *sealing said opening with a seal element*," as recited by Claim 11. (emphasis added)

In fact, the Examiner has stated that Layton discloses that a "contact wire 5 passes through an elastomeric seal 52 which seals the wall 3 surface." (Paper Number Date Mailed 05/24/2004, page 2) Applicants respectfully disagree and assert that electrical cable 5 of Layton does not pass through lower seal 52 of Layton.

Additionally, the Examiner has stated that Layton discloses that the "contact wire 5 is enclosed by a glass seal disposed in a compression element." (Paper Number Date Mailed 05/24/2004, page 3) Applicants respectfully disagree and assert that Layton does not teach, disclose or suggest that electrical cable 5 is enclosed by a glass seal disposed in a compression element.

Because Layton fails to teach, disclose or suggest all of the elements of Applicant's Claims 1, 9, 10 and 11, Applicants respectfully assert that Layton does not anticipate Claims 1, 9, 10 or 11. Therefore, Applicants traverse and submit that Claims 1, 9, 10 and 11 are patentable over Layton.

Claims 2-8, directly or indirectly, depend from and provide further patentable limitations to independent Claim 1. Claims 12-18, directly or indirectly, depend from and provide further patentable limitations to independent Claim 11. Because Claims 1 and 11 are deemed allowable, Claims 2-8 and 12-18 are allowable. Therefore, Applicant respectfully requests the Examiner to withdraw the rejection and allow Claims 1-18.

**CONCLUSION**

Applicants have now made an earnest effort to place this case in condition for allowance in light of the amendments and remarks set forth above. Applicants respectfully request reconsideration of Claims 1-18.

Applicants believe there are no additional fees due, however, the Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 50-2148 of Baker Botts L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.322.2606.

Respectfully submitted,

BAKER BOTTS L.L.P.  
Attorney for Applicants

A handwritten signature in black ink, appearing to read "Bruce Slayden II", with a stylized flourish at the end.

Bruce W. Slayden II  
Reg. No. 33,790

SEND CORRESPONDENCE TO:  
Baker Botts L.L.P.  
CUSTOMER ACCOUNT NO. 31625  
512.322.2606  
512.322.8306 (fax)

Date: August 24, 2004